Case 6:22-cr-06180-DGL Document 1-2 Filed 11/21/22 Page of Open COURT

Peter A. Moore, Jr., Clerk US District Court Eastern District of NC

# UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF NORTH CAROLINA WESTERN DIVISION

NO. 5:18 - (2-287-1FL (3) NO. 5:18-(2-287-2FL (3) NO. 5:18-(2-287-3FL (3)

UNITED STATES OF AMERICA

v.

indictment

The Grand Jury charges that:

## COUNT ONE

From a date unknown, but no later than on or about November 12, 2017, in the Eastern District of North Carolina, and elsewhere, SHAMSUDINE M. GREEN, also known as "Shamsuddi M. Green," MICHAEL LEE GREEN, and KAWUAN J. ROBERTSON did knowingly and intentionally combine, conspire, confederate, agree, and have a tacit understanding with each other and other persons, known and unknown to the Grand Jury, to knowingly and intentionally possess with the intent to distribute a mixture or substance containing a detectable amount of methamphetamine, a schedule II controlled substance, heroin, a schedule I controlled substance, and cocaine base (crack,) a schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 846.

### Quantity of Controlled Substances Involved in the Conspiracy

The amount of controlled substances involved in the SHAMBUDDINE M. GREEN, also known as "Shamsuddi M. Green," MICHAEL LEE GREEN, and KAWUAN J. ROBERTSON, the defendants herein, and the conduct of the other conspirators reasonably foreseeable to each of the defendants is fifty (50) grams or more of a mixture or substance containing a detectable amount of methamphetamine, a schedule II controlled substance, a quantity of heroin, a schedule I controlled substance, and a quantity of cocaine base (crack,) a schedule II controlled substance, in violation of Title 21, United States Code, Section 841(b)(1)(B).

(Remainder of page intentionally left blank)

#### ALLEGATIONS OF PRIOR CONVICTIONS

For purposes of Title 21, United States Code, Sections 841(b) and 851, the defendant, SHAMSUDDINE M. GREEN, also known as "SHAMSUDDI M. GREEN," committed the violations alleged in the Indictment after at least one (1) prior conviction for a felony drug offense, as defined in Title 21, United States Code, Section 802(44), had become final.

## ALLEGATIONS OF PRIOR CONVICTIONS

For purposes of Title 21, United States Code, Sections 841(b) and 851, the defendant, KAWUAN J. ROBERTSON committed the violations alleged in the Indictment after at least one (1) prior conviction for a felony drug offense, as defined in Title 21, United States Code, Section 802(44), had become final.

## FORFEITURE NOTICE

The defendants are given notice of the provisions of Title 21, United States Code, Section 853, and Title 18, United States Code, Section 924(d), made applicable by Title 28, United States Code, Section 2461(c), that all of their interest in all property specified herein is subject to forfeiture.

As a result of the offense charged in Count One of the Indictment, the defendants shall forfeit to the United States any and all property constituting, or derived from, any proceeds the defendant obtained directly or indirectly as a result of the said

offenses and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the offense alleged, or any property traceable to such property. This is including, but not limited to, a 2011 Black Ford Taurus SHO, VIN #1FAHP2KT4BG112060.

If any of the above-described forfeitable property, as a result of any act or omission the defendants,

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third person;
  - (3) has been placed beyond the jurisdiction of the court;
  - (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be subdivided without difficulty; it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendants up to the value of the above forfeitable property.

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REDACTED VERSION

Pursuant to the E-Government Act and the federal rules, the unredacted version of this document has been filed under seal.

DATE

ROBERT J. HIGDON, Jr. United States Attorney

BY: JAMES R. SAUNDERS

Special Assistant United States Attorney